

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22896-KMW

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Intervenor/Plaintiff.

**PLAINTIFFS' SUPPLEMENT TO PRELIMINARY (DE 81) EXHIBIT LIST
FOR AUGUST 6, 2025 HEARING**

Plaintiffs, through undersigned counsel, supplements¹ its Exhibit List (DE 81) for the August 6, 2025 Hearing.²

Supplemental Exhibit List

79	2025.08.02 Expert Disclosure Report - Dillon N. Reio, P.G. -AND- Everglades Pre & Post Stormwater Report	
80	Christopher W. McVoy CV	
81	KTNT 07-18-2025 Video of Dade-Collier TNT Airport https://vimeo.com/1102599234	
82	07/20/25 McVoy - Analysis of New Paving at the Dade Collier TNT Airport – McVoy (previously produced on 2025.08.01)	
83	McVoy – WERP: Dade-Collier Airport (Jetport) in Context of WERP	
84	McVoy - Panther Telemetry Mapping in Vicinity of Dade-Collier TNT (Jetport)	
85	McVoy – Report of Tour of Detention Center - McVoy - June 28, 2025	
86	Dillon Reio – Everglades Pre & Post Stormwater Report	
87	Declaration of Curt Bradley, filed August 1, 2025	DE 80-1
88	Map of Big Cypress Wildlife Management Area (4 Hunt map units) https://www.nps.gov/bicy/planyourvisit/upload/-9002373-4_Hunt_map_units.jpg , attached to D.E. 80, filed August 1, 2025	Cited in DE 80-1
89	2025.07.22 Soil Profile Dade Collier Training Airport (public record from FDEM) (previously produced on 2025.08.01)	
90	2025.06.30 Emergency Infrastructure at TNT Dade-Collier Airport (public record from FDEM) (previously produced on 2025.08.01)	
91	2025.07.07 Rev. Emergency Infrastructure at TNT Dade-Collier Airport (public record from FDEM) (previously produced on 2025.08.01)	
92	2025.07.08 Rev. Emergency Infrastructure at TNT Dade-Collier Airport (public record from FDEM) (previously produced on 2025.08.01)	
93	SWFMD ERP Permit No. 11-02446-P (previously produced on 2025.08.01)	
94	2008.10.02 Permit Application (previously produced on 2025.08.01)	

¹ Plaintiffs note that numerous of the supplemental exhibits identified herein (PX 82, 87-94) were provided to Defendants on August 1, 2025, but have been separately numbered for the sake of clarity on this supplemental list.

² Plaintiffs are awaiting FDEM's production of expedited discovery ordered by the Court (D.E. 64), and responses to public records requested by Plaintiffs (*see* D.E. 62-2), and reserve the right to supplement this list upon receipt of those documents.

95	Any and all documents identified by The Miccosukee Tribe of Indians	
96	Any and all documents identified as Exhibits by Defendants	
97	Any and all rebuttal and impeachment materials	

Dated: August 3, 2025

Respectfully submitted,

EARTHJUSTICE
4500 Biscayne Boulevard, Suite 201
Miami, Florida 33137
Telephone: (305) 440-5432

COFFEY BURLINGTON, P.L.
2601 South Bayshore Drive, Penthouse One
Miami, Florida 33133
Telephone: (305) 858-2900

By: s/ Tania Galloni
Tania Galloni, Fla. Bar No. 619221
tgalloni@earthjustice.org
Dominique Burkhardt, Fla. Bar No. 100309
dburkhardt@earthjustice.org
Alisa Coe, Fla. Bar No. 10187
acoe@earthjustice.org

By: s/ Paul J. Schwiep
Paul J. Schwiep, Fla. Bar No. 823244
PSchwiep@CoffeyBurlington.com
Scott Hiaasen, Fla. Bar No. 103318
SHiaasen@CoffeyBurlington.com
YVB@CoffeyBurlington.com
LPerez@CoffeyBurlington.com
service@CoffeyBurlington.com

Counsel for Friends of the Everglades

Counsel for Plaintiffs

CENTER FOR BIOLOGICAL DIVERSITY
Elise Pautler Bennett, Fla. Bar No. 106573
ebennett@biologicaldiversity.org
Jason Alexander Totoiu, Fla. Bar No. 871931
jtotoiu@biologicaldiversity.org
Post Office Box 2155
St. Petersburg, FL 33731
Telephone: (727) 755-6950

Counsel for Center for Biological Diversity

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 3, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

Service List	
Nathan A. Forrester Chief Deputy Solicitor General nathan.forrester@myfloridalegal.com Robert S. Schenck Assistant Solicitor General robert.schenck@myfloridalegal.com Office of the Attorney General The Capitol, PL-01 Tallahassee, Florida 32399-1050 Telephone: (850) 414-3300 jenna.hodges@myfloridalegal.com Boies Schiller Flexner LLP Jesse Panuccio, Esq. jpanuccio@bsflfp.com Evan Ezray, Esq. eezray@bsflfp.com David Costello, Esq. dcostello@bsflfp.com 401 East Las Olas Boulevard, Suite 1200 Fort Lauderdale, Florida 33301 Telephone: (954) 356-0011 jpanuccio@BSFLLP.com fileserv@bsflfp.com <i>Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management</i>	HAYDEN P. O'BYRNE United States Attorney Carlos J. Raurell Assistant U.S. Attorney carlos.raurell@usdoj.gov 99 Northeast 4 th Street Miami, Florida 33132 Telephone: (305) 961-9243 melissa.Jiminson@usdoj.gov ADAM R.F. GUSTAFSON Acting Assistant Attorney General Environment and Natural Resources Division United States Department of Justice Peter M. Torstensen, Jr. Deputy Assistant Attorney General Environment and Natural Resources Division United States Department of Justice Hayley A. Carpenter Trial Attorney hayley.carpenter@usdoj.gov Marissa Piropato Deputy Chief mairssa.piropato@usdoj.gov Natural Resources Section Ben Franklin Station P.O. Box 7611 Washington, D.C. 20044-7611 Telephone: (202) 305-0242 <i>Counsel for Kristi Noem, in her official</i>

	<i>capacity as Secretary, United States Department of Homeland Security, and Todd Lyons, in his official capacity as Acting Director, United States Immigration and Customs Enforcement</i>
<p>GERALDINE BONZON-KEENAN Miami-Dade County Attorney Christopher J. Wahl Assistant County Attorney wahl@miamidade.gov Monica Rizo Perez Assistant County Attorney rizo@miamidade.gov David M. Murry Assistant County Attorney DMMurray@FlyMIA.com Stephen P. Clark County 111 Northwest 1st Street, Suite 2810 Miami, Florida 33128 Telephone: (305) 375-5151 Victor.Rodriguez3@miamidade.gov Madalis.Gonzalez@miamidade.gov KGriffin@FlyMIA.com</p> <p><i>Counsel for Miami-Dade County</i></p>	<p>Todd R. Friedman, Esq. todd@toddfriedmanpa.com TODD R. FRIEDMAN, P.A. 1101 Brickell Avenue Suite S-700 Miami, Florida 33131 Telephone: (786) 536-7190</p> <p><i>Counsel for The Miccosukee Tribe of Indians</i></p>